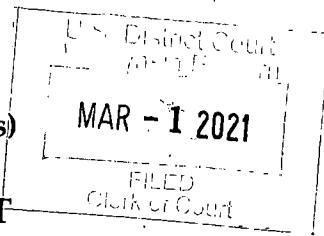


# COMPLAINT

(for filers who are prisoners without lawyers)

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN



(Full name of plaintiff(s))

D'Qualynn Garman

v.

Case Number:

21-c-0277

(to be supplied by Clerk of Court)

(Full name of defendant(s))

Milwaukee County

Sheriffs Office

Inmate Abu Abraham Dukuly

### A. PARTIES

1. Plaintiff is a citizen of Texas and is located at  
(State)

Milwaukee County Jail 949 N. 9th St.

(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant MCSO (Name)

is (if a person or private corporation) a citizen of Wisconsin

and (if a person) resides at inmates incarcerated in MCJ (State, if known)  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Milwaukee County Jail  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

WRITTEN ON  
SEPARATE  
PIECE OF COPY  
PAPER  
(NEXT PAGE)

D'Quallynn Garmon

# Statement Of Claim

Debra

I'm suing for; Attempted Homicide, Attempted Sexual Assault, Assault and Battery, and Negligence, and Mental Emotional Distress

Who: Abraham Abdu Dokuly (An Aggressive Inmate) and MCSD Correction  
What: Due to negligence and lack of professionalism on the behalf of the Correctional Officers at Milwaukee County Jail, the officers failed to ensure my safety and security when inmate Abraham kicked his door open while I was out for my daily one hour individual recreation while I was also secured in a Ripp Belt so my hands were secured to my lower abdomen, at the time I was only on suicide watch and Abraham was on Max Custody so he was not suppose to have any physical contact with me. He ran up towards me aggressively so I threw my milk carton at him and missed due to being in a Ripp Belt. He was completely nude saying, "I should kill you" and that "he me suck his dick due to me being trapped and defenseless". He physically assaulted me by striking me with his fist multiple times to my face, neck, and back repeatedly then he grabbed me only assuming he was about to sexually violate me and eventually take my life but stopped and ran when the COs finally arrived. While running back to his cell he said I was lucky. I was asked by the Lieutenant if I was ok and if I wanted to press charges, I said I was physically fine but mentally and emotionally disturbed, I was told I could talk to a Right Social Worker in the morning and refused to press charges due his mental health issues. I asked for the COs names and badge numbers for lawsuit purposes and was denied the information. After the situation they kept the inmate in the same pod as me and he taunted me, not once did they put a keep separate on us to ensure our safety.

\*Let it be known Abraham was originally placed on Max Custody for assaulting officers, nurses, and mental health staff. He refused to hold conversation with Mental Health and was sent to the State Mental Institution.

When: November 18th, 2020 18:50 (On Camera)

Where: While in the Mental Health Unit of MCJ on Suicide Watch and Abraham on Max Custody (Cell #8 Sub-Pod B)

Why: He has a serious mental health issue and only reacted off of the negligence of the officers. And I believe I should sue to the highest extent of the law due to not knowing his intentions, motives, and reasoning besides to embarrass and put my life in danger.



C. JURISDICTION

I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$5 M.).

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I honestly believe that I should be compensated comfortably with money beyond reasonable doubt because being that this incident occurred in the Mental Health Unit involving an aggressive inmate who was supposed to be under supervision of Correctional Officers was able to attack and attempted to sexually harass / assault me and murder me while I was in a restraint belt, unable to fully defend for myself while I was forced to endure multiple punches and being touch inappropriately by a naked and aggressive mentally ill assailant.

E. JURY DEMAND

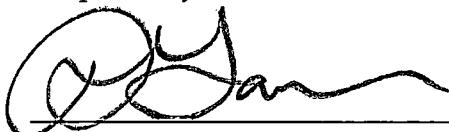
I want a jury to hear my case.

- YES       - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

Respectfully Submitted,



\_\_\_\_\_  
Signature of Plaintiff

2019022052

Plaintiff's Prisoner ID Number

949 N. 9th St. 53253

\_\_\_\_\_  
(Mailing Address of Plaintiff)

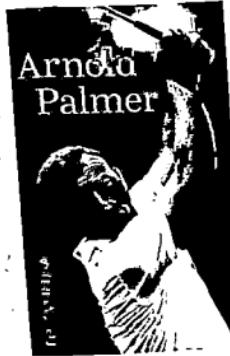
(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE**

I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.

I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.

Quailynn Garrison  
#2019822052  
249 N. 9th St.  
Milwaukee, WI. 53233  
Milwaukee County Jail



Clerk of Court  
United States District Court  
for the Eastern District of Wisconsin  
517 E. Wisconsin Ave. Rm #362  
Milwaukee, WI. 53202